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September 1, 2020

**Via ECF**

Honorable Judge Lorna G. Schofield

United States District Court

Southern District of New York

500 Pearl St

New York, NY 10007

**Re:       *Andre Francis v. National Railroad Passenger Corp.*  
              *Civil Action No: 1:20-CV-01713-LGS***

Dear Judge Scofield:

This office represents Defendant, National Railroad Passenger Corp., in the above captioned matter. This letter is submitted, jointly with counsel for Plaintiff, Sean Constable, Esq., of Flynn & Wietzke, P.C., to request a 60-day adjournment of all discovery deadlines. This is the Parties' first request for an extension.

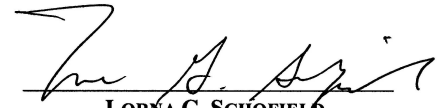
Due to the various restrictive orders and complications associated with COVID-19, the Parties are unable to complete discovery within the current schedule. To date, the Parties have exchanged Rule 26 Disclosures and other written discovery, including medical records. The parties have also exchanged responses to discovery demands. However, due to the current situation, the ability to obtain certain materials has been greatly hampered. Therefore, the Parties respectfully request a 60-day extension of all deadlines as follows:

- Fact discovery, including depositions, currently scheduled for 9/1/2020, to **10/30/2020**;
- Expert discovery, currently scheduled for 10/16/2020, to **12/15/2020**;
- Pre-Motion Conference, currently scheduled for 10/30/20, to **12/29/2020 or 1/5/2021**.

Thank you for your attention and consideration to this request.

Respectfully submitted,  
*s/ John A. Bonventre, Esq.*

cc:       Sean Constable (*via ECF*)

  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Application DENIED without prejudice to renewal. Per the Individual Rules, all extension requests must be made at least two business days before the deadline. Fact discovery closed on September 1, 2020, and the parties were advised in the April 20, 2020, Order that the Court does not extend the deadlines for fact and expert discovery absent compelling circumstances. By **September 4, 2020**, the parties shall renew their request, specifying what discovery is outstanding and how the current circumstances have hampered discovery efforts. The Clerk of Court is respectfully directed to close Dkt. Nos. 16 and 17.